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Attorneys for Plaintiff/Intervenor
 JANET STEGE

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

EQUAL EMPLOYMENT OPPORTUNITY
 COMMISSION,

Plaintiff

v.

GEORGIA-PACIFIC LLC,

Defendant.

CIVIL ACTION NO. C-07-3944 (SBA)

**NOTICE OF MOTION AND MOTION
 FOR LEAVE TO INTERVENE**

Date: March 4, 2008
 Time: 1:00 p.m.
 Courtroom: 3, 3rd Fl. (Oakland)
 Judge: Hon. Sandra B. Armstrong

TO PLAINTIFF AND DEFENDANTS AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 4, 2008 at 1:00 p.m. in Courtroom 3
 (Oakland), or as soon thereafter as the matter may be heard, the aggrieved party, JANET
 STEGE, will and now does hereby move this Court under F.R.C.P. Rule 24(a) for leave to
 intervene in the above-referenced action as a party Plaintiff. The Plaintiff/Intervenor's motion
 will be heard by the Honorable Sandra Brown Armstrong in Courtroom 3 of the United States
 Federal District Court in Oakland, California.

This motion is brought in order that the aggrieved party might assert the claims set forth
 in her proposed Complaint in Intervention, a copy of which is attached as Exhibit A to the
 Declaration of Kathryn Burkett Dickson in Support of the Motion to Intervene. The grounds
 for the motion are:

1 (1) Janet Stege must be permitted to intervene as a matter of right, when a federal
2 statute confers the unconditional right to intervene in the action, and the motion
3 to intervene is timely; and

4 (2) The motion to intervene is timely in this action because Ms. Stege has sought to
5 intervene at an early stage of the proceedings and is seeking no delay in the trial
6 date or pre-trial deadlines established by the Court. The Complaint was filed in
7 August, 2007; and the parties acknowledged in their joint initial case
8 management statement on October 31, 2007, that Ms. Stege was seeking
9 individual counsel and intended to seek intervention. Defendant will not be
10 prejudiced by the intervention in that no depositions have occurred, no
11 mediation has taken place, and no delay is being sought in the trial or pre-trial
12 deadlines. The only discovery which has occurred to date has been the exchange
13 of Initial Disclosures by the original parties and Plaintiff EEOC has fully
14 responded to one set of interrogatories and one request for production of
15 documents.

16 This motion is based on this Notice, the accompanying Memorandum of Points and
17 Authorities with the attached Complaint in Intervention, the Declaration of Kathryn Burkett
18 Dickson, and the Complaint filed by the Equal Employment Opportunity Commission.

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20 Dated: January 10, 2008

DICKSON - ROSS LLP

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22 By: /S/ Kathryn Burkett Dickson
23 Kathryn Burkett Dickson
24 Attorneys for Plaintiff/Intervenor
25 JANET STEGE
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